

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL MOI, an individual,
Plaintiff,

v.

CHIHULY STUDIO, INC., a Washington
corporation; DALE CHIHULY,
individually and as a married person;
LESLIE CHIHULY, individually and as a
married person,
Defendants.

CHIHULY INC., a Washington
corporation; and DALE CHIHULY,
individually,
Counterclaim-
Plaintiffs,

v.

MICHAEL MOI, an individual,
Counterclaim-
Defendant

No. 2:17-cv-00853-RSL

DECLARATION OF IAN D. ROGERS IN
SUPPORT OF DEFENDANTS' AND
COUNTERCLAIM PLAINTIFFS' MOTION
TO FILE DOCUMENTS UNDER SEAL
(MOTION FOR PROTECTIVE ORDER
AND SUPPORTING DOCUMENTS)

Ian D. Rogers declares as follows:

1 1. I am a lawyer of the law firm Perkins Coie LLP and counsel for defendants
2 Chihuly, Inc., Dale Chihuly, and Leslie Chihuly (collectively, “Defendants”) in this action. I
3 make this declaration based on personal knowledge and I am competent to do so.

4 2. On January 23, 2019, I emailed counsel for Plaintiff, Lincoln Beauregard and
5 Evan Fuller, to confer regarding ways to minimize the amount of information filed under seal in
6 connection with Defendants’ Motion for Protective Order. I advised that, consistent with this
7 Court’s prior orders, Chihuly intended to file under seal references to Chihuly’s confidential
8 business agreements, private third-party information, and a copy of a February 28, 2018 sealed
9 *ex parte* order. I stated that, Chihuly did not see a way to avoid sealing of these materials, and
10 asked if Plaintiff’s counsel had any proposals for doing so. Plaintiff’s counsel has not
11 responded.

12 **I declare under penalty of perjury under the laws of the United**
13 **States that the foregoing is true and correct.**

14 EXECUTED this 24th day of January, 2019.

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16 *s/ Ian D. Rogers*

17 _____
18 Ian D. Rogers
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CERTIFICATE OF SERVICE

I certify that on January 24, 2019, I caused the foregoing to be served on the following attorney(s) of record by the method(s) indicated:

Lincoln C. Beauregard	<input type="checkbox"/> Via U.S. Mail, 1st Class, Postage Prepaid
Evan T. Fuller	<input type="checkbox"/> Via Hand Delivery
Connelly Law Offices	<input type="checkbox"/> Via Overnight Delivery
2301 North 30th Street	<input type="checkbox"/> Via Facsimile
Tacoma, WA 98403	<input checked="" type="checkbox"/> Via ECF
lincolnb@connelly-law.com	
efuller@connelly-law.com	

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 24th day of January, 2019.

s/ Ian D. Rogers
IRogers@perkinscoie.com
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099